

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, DC 20268

In the Matter of:

Prairie Hill, Texas 76678
Post Office State Zip Code

Docket No: A2011-50

Stell Waldrop, Jr.: Petitioner

PARTICIPANT STATEMENT

1. Petitioner(s) are appealing the Postal Service's Final Determination concerning the Prairie Hill post office. The Final Determination was posted July 13, 2011.

2. In accordance with applicable law, 39 U.S.C. Section 404(d)(5), the Petitioner(s) request the Postal Regulatory Commission to review the Postal Service's determination on the basis of the record before the Postal Service in the making of the determination.

3. Petitioners: Please set out below the reasons why you believe the Postal Service's Final Determination should be reversed and returned to the Postal Service for further consideration. (See pages of the Instructions for an outline of the kinds of reasons the law requires us to consider.) Please be as specific as possible. Please continue on additional paper if you need more space and attach the additional page(s) to this form.

Please incorporate the Petitioner's initial appeal consisting of eight pages dated August 12, 2011 on file at the PRC as part of this Participant Statement.

- (1) The final determination is arbitrary and capricious and non-compliant with provisions of 39 U.S.C. 101(b) which stipulates that the Postal Service shall provide a maximum degree of effective and regular postal services to rural areas, communities and small towns where Post Offices are not self-sustaining. Section 101(b) further provides that no small Post Office shall be closed solely for operating at a deficit, it being the specific intent of the Congress that effective postal services be insured to residents of both urban and rural communities.

The stated reason by the Postal Service for closing the Post Office was insufficient revenues and that is in direct violation of the aforementioned law and expressed Congressional intent regarding operation of small post offices and service to its patrons.

Furthermore, the proposed alternate service of providing delivery and retail services through rural route service under administrative responsibility of the Coolidge Post Office located 11 miles away does not provide a maximum degree of regular and effective postal services as required by law.

Specific examples which exemplify that the proposed alternate service will not provide the required maximum degree of effective postal service are:

- Retail Services, Handling of Accountable Mail, i.e., Certified, Registered, Insured, C.O.D. and Express Delivery, Pickup and mailing of Large Parcels

Contrary to Postal Service contentions, the rural carrier will be able to provide only minimal services. Many patrons use debit and/or credit cards exclusively which will not be available from the rural carrier. Many patrons are unable to meet the carrier at the roadside box to conduct the limited amount of business the carrier is able to transact due to work schedules, disabilities, or infirmities.

Delivery, pickup and mailing of large parcels, as well as large volumes of mail particularly delivery of such items which will not fit into the roadside boxes is a major expressed concern of several postal patrons which has not been adequately addressed by the Postal Service.

Postal patrons should not be required to travel 11 miles (22 miles round trip) to the Coolidge, Texas Post Office to obtain such services. Many such patrons are elderly and do not have the means to travel this distance to obtain services which should be provided by the local Post Office as required by law.

- Mail Security

This is a major concern with rural carrier service which could result in identity theft through the theft of personal information such as social security numbers, credit accounts, and bank account information.

Many Postal Customers receive regular medications by mail which could be compromised by theft and/or exposure to adverse weather conditions.

Many customers in this farming/ranching area receive checks and other negotiable instruments for goods, services and other considerations which are not secure in roadside mailboxes.

Some previous rural route customers discontinued this service and rented Post Office boxes at the Prairie Hill Post Office due to actual mail security issues. The only answer provided by the Postal Service, to this expressed concern by several patrons during the comment period, was to place a lock on the mailboxes. This type of lock is not an effective deterrent to prevent theft.

- (2) The Postal Service failed to fully consider the effect of the closing on the community served by this Post Office (see 39 U.S.C. Section 404(d)(2)(A)(i)). The Prairie Hill Post Office is the focal point for the community and provides many non-postal services such as a public bulletin board, community gathering locations, government forms, etc.

Postal Service employees provide needed assistance to many senior citizens, handicapped, and other persons with special needs. This assistance includes postal as well as non-postal matters. Most of the area residents are senior citizens which magnifies the need for continued operations at the Prairie Hill Post Office.

Contrary to the viewpoint of the Postal Service in response to concerns raised by several patrons including this Petitioner in initial comments to the possible closing, actual closure would destroy community identity.

Prairie Hill has one business, two churches, one cemetery, one rural water supply corporation, and a volunteer fire department which would be adversely impacted by the closing. The Post Office has had a continuous presence in Prairie Hill for approximately 100 years.

Closure of this Post Office would have a long term, irrevocable, adverse effect on the postal patrons and the community as a whole.

Such closing would also stymie potential population growth for this rural area as many residents of nearby cities such as Waco are migrating to rural areas to live and commute to jobs in the city.

- (3) As stated in my original appeal dated August 12, 2011, the estimated economic savings set forth in the final determination are questionable. Particularly the annual cost for replacement service of only \$3,894 which was not detailed. Also, the use of the Postmaster Salary (EAS-11) of \$33,168 plus fringe benefits of \$11,111 for a total of \$44,279 as an annual savings distorts the true operational salary cost of this Post Office. As shown in the final determination, the Postmaster position has been vacant since July 5, 2007. By the Postal Service's own election, the office has been operated by a PMR/OIC for over four years with an estimated annual salary of approximately \$18,000 with no fringe benefits. Accordingly, the Postal Service estimated annual savings is overstated by approximately \$26,279 (\$44,279-\$18,000) due to the aforementioned salary cost distortion alone.

It is a recognized fact that the Postal Service is experiencing a severe financial crisis. However, it is also a recognized fact that the cost of maintaining all small and rural post offices is only a very small percentage of the total Postal Service operating budget.

Therefore, it would appear that more effective and quantitative cost saving measures such as elimination of Saturday delivery, streamlined management practices, and reduction of any excessive mid and upper-level management positions would be in order.

Closing of small rural post offices such as Prairie Hill would have a major detrimental effect on the community and a very minimal impact on alleviating the overall Postal Service financial situation.

Based on the foregoing, the Postal Service determination to close the Prairie Hill Post Office is not in accordance with applicable laws and regulations and violates the expressed intent of Congress that the Postal Service shall provide a maximum degree of effective and regular postal services to rural areas, communities, and small towns where Post Offices are not self-sustaining. Further, that no small Post Office shall be closed solely for operating at a deficit.

Please review the facts, reverse the Final Determination and return the entire matter to the Postal Service for further consideration.

Sincerely,

Stell Waldrop, Jr., Petitioner
P.O. Box 6
Prairie Hill, TX 76678